

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

OLIVIA Y., et al.

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, et al.

DEFENDANTS

**NOTICE OF 30(b)(6) DEPOSITION OF THE DEPARTMENT
OF HUMAN SERVICES**

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 30 and 30(b)(6), Plaintiffs, by their undersigned attorneys, will take the deposition upon oral examination of the State of Mississippi, the Department of Human Services and the Division of Family and Children's Services, before a certified court reporter duly authorized to administer oaths. The deposition will be conducted at the offices of Bradley, Arant, Rose & White LLP, 188 East Capitol Street, Suite 450, Jackson, Mississippi 39201 on June 15, 2005, at 8:30 a.m. and thereafter from day to day as may be required.

PLEASE TAKE FURTHER NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendants are required to designate one or more officers, directors, agents, or other persons who consent to testify on their behalf on the matters described in Exhibit A attached hereto.

RESPECTFULLY SUBMITTED, this, the 25th day of May, 2005.

/s Melody McAnally

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PLAINTIFFS' COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2005, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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/s Melody McAnally

EXHIBIT A

MATTERS ON WHICH TESTIMONY IS SOUGHT

1. The process by which the following needs of children placed in Mississippi Department of Human Services custody are assessed:
 - a. Physical health;
 - b. Dental health;
 - c. Mental health, including but not limited to psychiatric/psychological disorders, behavioral issues, and neurological disabilities;
 - d. Developmental needs; and
 - e. Educational needs, including but not limited to appropriate special educational services and access to a high school degree rather than a GED.
2. The process by which the following needs of children placed in Mississippi Department of Human Services custody are provided for:
 - a. Physical health;
 - b. Dental health;
 - c. Mental health, including but not limited to psychiatric/psychological disorders, behavioral issues, and neurological disabilities;
 - d. Developmental needs; and
 - e. Educational needs, including but not limited to appropriate special educational services and access to a high school degree rather than a GED.
3. The interaction between the Division of Family and Children's Services and other State agencies providing services to children, including:

- a. Other divisions within the Department of Human Services;
 - b. The Department of Health; and
 - c. The Department of Mental Health.
4. The interaction between the Division of Family and Children's Services and all other public and private providers of services to children in custody, including but not limited to emergency shelters, residential treatment centers, therapeutic foster homes, group homes, mental retardation centers, and any institutions licensed by the Department of Health or Department of Mental Health in which children have resided after being placed in Mississippi Department of Human Services custody by a Youth Court.
5. The nature and scope of medical services (including but not limited to mental health services) available and provided to children in custody, whether through public or private entities.
6. The nature and scope of medical services (including but not limited to mental health services) reimbursed by Medicaid for children in custody.
7. The nature and scope of any assessment of State-wide service needs for children in custody by the Division of Family and Children's Services.
8. The nature and scope of contracts for services to children in custody entered into by the Division of Family and Children's Services and the process by which such contracting occurs.
9. The sources and scope of aggregate data concerning the topics listed above.
10. The location of documents concerning the topics listed above and the individuals responsible for maintaining those documents.